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A Limited Liability Partnership
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Attorneys for Debtor
BELLAROSE ARZADON BACLIB

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re	BK Case No.: 23-30311-HLB
BELLAROSE ARZADON BACLIB,	Chapter 13
Debtor.	DECLARATION OF COUNSEL

**DECLARATION OF COUNSEL BRENT D.
MEYER IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL FOR DEBTOR
FILED BY MEYER LAW GROUP LLP**

Date: [NO HEARING SCHEDULED]
Time:
Location: Telephonic / Videoconference¹
Judge: Hon. Hannah L. Blumenstiel

¹ See <https://www.canc.uscourts.gov/sites/default/files/announcements/SF%20Division%20Hearing%20Procedures%20of%20as%20of%209.1.2023%29.pdf> (All “hearing[s] will not be conducted in the presiding judge’s courtroom but instead will be conducted by telephone or video.”)

1 I, Brent D. Meyer, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California and I am
3 admitted to practice in the above-referenced Court. I am an attorney in the law firm Meyer Law
4 Group, LLP (“Meyer LLP”), counsel for debtor Bellarose Arzadon Baclig (“Debtor”). I have
5 personal knowledge of the facts set forth in this declaration and, if called as a witness, I could
6 and would testify competently thereto, except with respect to those matters stated to be on
7 information and belief, and as to those matters, I believe them to be true.

8 2. I make this declaration in support of the *Motion to Withdraw as Counsel for*
9 *Reorganized Debtor Filed by Meyer Law Group, LLP* (the “Motion”) filed concurrently herewith
10 in the about referenced matter.

11 3. As of the date of the Declaration, there has been a breakdown in communications
12 between myself (and the law firm Meyer Law Group, LLP) and Debtor regarding representation
13 in the above-captioned matter. Unfortunately, however, applicable law prohibits me from
14 disclosing confidential attorney-client communications related to the breakdown of
15 communications with Debtor in this matter, but upon request, I will provide the Court with any
16 additional facts requested for in camera review, to the extent authorized by applicable law.

17 4. Despite repeated attempts to provide Debtor with sound legal advice, Debtor has
18 not heeded my legal advice and failed to take necessary steps to implement the terms of her
19 proposed Chapter 13 Plan [Dkt. No. 18].

20 5. On August 16, 2023, I sent an email to Debtor along with a *Substitution of*
21 *Attorney* to effectuate termination of Meyer LLP as counsel, in which Debtor would represent
22 herself (in *pro per*) in the Bankruptcy Case, until such time that she retains new counsel.
23 Unfortunately, Debtor did not respond to this email. Id.

24 6. On August 25, 2023, I followed up with Debtor regarding executing the
25 *Substitution of Attorney*, but unfortunately, again Debtor did not respond to this email or provide
26 an executed copy of the *Substitution of Attorney*.

27 7. As of the date of the Declaration, I have spent in excess of thirty (30) hours
28 working on above-captioned matter, I did not receive a pre-petition retainer from Debtor, I have

1 not received any payments from third-parties, I have not received any payments from the
2 Trustee, and I even personally advanced payment for the Chapter 13 filing fees (\$313.00), the
3 pre-filing credit counseling course (\$25.00), and the credit report (\$38.00) on behalf of Debtor.²

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5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct.

7 Executed on this 25th day of September, 2023 at Walnut Creek, California.

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9 By: /s/ BRENT D. MEYER
10 Brent D. Meyer

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² The Motion shall not in any way be construed as a waiver of the attorney's fees and costs incurred by Meyer Law Group, LLP in this matter, and the firm reserves the right to seek payment from Debtor for fees incurred and costs advanced in this matter.

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DECLARATION OF COUNSEL BRENT D. MEYER IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR FILED
BY MEYER LAW GROUP LLP

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